

APR 28 2017

Mr. Lawrence C. Rosen
Environmental Operations, Inc
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: March 9, 2017, Response to the EPA Comments letter on the Draft Corrective Measures Study
Report dated July 31, 2016, for the former Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 and Missouri Department of Natural Resources (the Agencies) have completed a review of your response to our comments on the CMS Report. Both Agencies accept all your comments except your response to the EPA's comment #6 regarding our request to include an active remedial component for the remedy you propose for the source area in the FF Building Area. Currently, EOI is only proposing monitored natural attenuation and institutional controls for that area. As we have discussed before, however, this proposed remedy for the FF Building Area does not meet one of the general standards for corrective measures, since it does not control the source of the release that is contributing to an off-site contaminant plume.

To move the remedy selection process forward the EPA and MDNR request that EOI revise the CMS Report in accordance with your response letter for the remainder of the comments and submit the revised CMS Report to the EPA and MDNR within 30 days of your receipt of this letter.

Once this revised document is received, it is the Agencies' intent to develop a Statement of Basis that will propose a remedy for the Site and the revised CMS Report will be included in the Administrative Record to support that Statement of Basis.

Please be aware, that the EPA's proposed remedy for the FF Building Area will include an active remedial component in order to control continued releases from this source area. It is the Agencies' preference to propose a remedy consistent with the preferred alternative identified in the CMS, but that cannot be accomplished where the preferred alternative identified by the facility does not comply with threshold criteria.

Note that EOI and other interested parties will be able to comment on the proposed remedy during the public comment period. The Agencies will respond to all comments prior to making a final remedy selection for the Site.

I can be reached at (913) 551-7755 or by email at morrison.bruce@epa.gov if you have any questions concerning this matter.

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CONCURRENCES		
SYMBOL	WRAP	WRAP
NAME	Morrison	Johnson
INITIALS/DATE	BM-4-28-17	WJ 4/28/17

RCRA



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Sincerely,

Bruce A. Morrison
Project Manager
RCRA Corrective Action and Permits Section
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
Rich Nussbaum, MDNR
Stacy Hastie, SWH Investments
Eric Page, EOI